

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA : SEALED INDICTMENT  
:  
- v. - :  
FRANK BROWN, : 20 Cr. 444-UA  
a/k/a "Nitty," :  
:  
PEDRO RAINESY, :  
a/k/a "P," :  
a/k/a "Super Model P," :  
:  
JOSEPH SCOTT, :  
a/k/a "Killer," :  
:  
TONYA BROWN, :  
a/k/a "Tonya Sanders," and :  
:  
RAYMOND BROWN, :  
:  
Defendants. :  
:  
- - - - - X

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about July 2019 up to and including in or about August 2020, in the Southern District of New York and elsewhere, FRANK BROWN, a/k/a "Nitty," PEDRO RAINESY, a/k/a "P," a/k/a "Super Model P," JOSEPH SCOTT, a/k/a "Killer," TONYA BROWN, a/k/a "Tonya Sanders," and RAYMOND BROWN, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together

and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FRANK BROWN, a/k/a "Nitty," PEDRO RAINY, a/k/a "P," a/k/a "Super Model P," JOSEPH SCOTT, a/k/a "Killer," TONYA BROWN, a/k/a "Tonya Sanders," and RAYMOND BROWN, the defendants, and others known and unknown, would and did distribute, and possess with the intent to distribute, controlled substances, in violation of Title 21, United States Code, Section 841(a) (1).

3. The controlled substances that FRANK BROWN, a/k/a "Nitty," PEDRO RAINY, a/k/a "P," a/k/a "Super Model P," JOSEPH SCOTT, a/k/a "Killer," TONYA BROWN, a/k/a "Tonya Sanders," and RAYMOND BROWN, the defendants, and others known and unknown, conspired to distribute and to possess with the intent to distribute were: (i) 280 grams or more of a mixture or substance containing cocaine base, in violation of Title 21, United States Code, Section 841(b) (1) (A), and (ii) 100 grams or more of a mixture or substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b) (1) (B).

4. The controlled substance that FRANK BROWN, a/k/a "Nitty," PEDRO RAINY, a/k/a "P," a/k/a "Super Model P," JOSEPH SCOTT, a/k/a "Killer," and TONYA BROWN, a/k/a "Tonya Sanders," the defendants, and others known and unknown, conspired to

distribute and to possess with the intent to distribute was a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Indictment, FRANK BROWN, a/k/a "Nitty," PEDRO RAINY, a/k/a "P," a/k/a "Super Model P," JOSEPH SCOTT, a/k/a "Killer," TONYA BROWN, a/k/a "Tonya Sanders," and RAYMOND BROWN, the defendants, shall forfeit to the United States, pursuant to Title 21, United States code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSET PROVISION

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or sold to, or deposited with, a

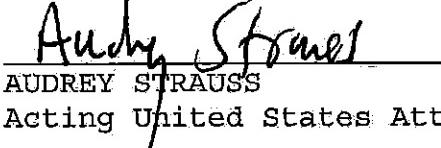
third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.



John Doe  
FOREPERSON



Audrey Strauss

AUDREY STRAUSS  
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

FRANK BROWN, a/k/a "Nitty," et al,

Defendants.

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SEALED INDICTMENT

20 Cr. 444-UA

(21 U.S.C. §§ 841(a)(1), 846.)

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AUDREY STRAUSS  
Acting United States Attorney

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Foreperson

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